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11 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
12

13 WASHOE COUNTY SCHOOL DISTRICT,

14 Plaintiff,

15 v.

16 META PLATFORMS, INC.; FACEBOOK  
17 HOLDINGS, LLC; FACEBOOK PAYMENTS,  
INC.; FACEBOOK OPERATIONS, LLC;  
18 INSTAGRAM, LLC; SICULUS, INC.; META  
PAYMENTS, INC.; SNAP INC.; TIKTOK,  
19 INC.; BYTEDANCE, INC.; BYTEDANCE  
LTD.; TIKTOK LTD.; TIKTOK LLC;  
20 GOOGLE LLC; and YOUTUBE LLC,  
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Defendants.  
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CASE NO. 4:23-cv-5729

MDL NO. 4:22-md-03047

**NOTICE OF LEXECON OBJECTION**

NOTICE IS HEREBY GIVEN THAT, in accordance with Case Management Order No. 13 (MDL 3047, ECF No. 780), plaintiff Washoe County School District (“Plaintiff”) hereby asserts its rights with respect to the jurisdiction of this Court for purposes of trial and objects to such jurisdiction pursuant to *Lexecon, Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26 (1998). As stated in Plaintiff’s complaint, the complaint is deemed to have been filed in the United States District Court for the District of Nevada. *See* Case No. 4:23-cv-5729, ECF Nos. 1, 11; *see also* CMO 4, § II.D (MDL 3047, ECF No. 119) (“At the completion of all pretrial proceedings ... this Court shall transfer such cases to the federal district court identified by the Plaintiff....”).

DATED: May 17, 2024

**WAGSTAFF & CARTMELL LLP**

/s/ Austin Brane

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**Attorneys for Plaintiff Washoe County School  
District**

**PROOF OF SERVICE**

STATE OF MISSOURI, COUNTY OF JACKSON

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Jackson, State of Missouri. My business address is 4740 Grand Avenue, Suite 300, Kansas City, MO 64112.

On May 17, 2024, I served true copies of the following document(s) described below on the interested parties in this action as follows: **NOTICE OF LEXECON OBJECTION** using the Court's electronic filing system, thereby sending notice of the filing to all counsel of record in this matter.

I declare under penalty of injury under the laws of the State of Missouri that the foregoing is true and correct.

Executed on May 17, 2024, at Kansas City, Missouri.

/s/ Peggy Bradshaw  
Peggy Bradshaw